

DEPARTMENT OF THE TREASURY INTERNAL REVENUE SERVICE WASHINGTON, D.C. 20224

201948010

SEP 0 3 2019

T: EP:RA: AZ

Re: Substitute Mortality Table Ruling

Taxpayer =

Plan =

Merging Plan 1 =

Merging Plan 2 =

Merging Plan 3 =

Dear

This letter is to inform you that your request to use substitute mortality tables for making computations under section 430 of the Internal Revenue Code (the "Code") for the Plan has been granted with respect to the populations specified in this letter. This ruling is effective for a period of plan years beginning with the plan year commencing November 1, Your request has been granted in accordance with section 430(h)(3) of the Code and section 303(h)(3) of the Employee Retirement Income Security Act of 1974.

This approval applies to the following specific populations:

- Male participants (annuitants and nonannuitants), including disabled participants
- Female participants (annuitants and nonannuitants), including disabled participants

In granting this approval, we have only considered whether the substitute mortality rates were developed in accordance with section 1.430(h)(3)-2 of the Income Tax Regulations ("Regulations") and Revenue Procedure 2017-55. Accordingly, we are not expressing any opinion as to the accuracy or acceptability of any calculations or other material submitted with your request.

Permission is hereby granted to use the substitute mortality rates shown in the table below for the Plan:

Substitute Mortality Tables
Approved for use beginning with the plan year commencing November 1, ...
Base year

Age	Male Annuitants and Nonannuitants, including Disabled Participants	Female Annuitants and Nonannuitants, including Disabled Participants
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1 2 3 4 5 6 7 8 9		
8		
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11		
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Age	Male Annuitants and Nonannuitants, including Disabled Participants	Female Annuitants and Nonannuitants, including Disabled Participants
23 24 25 26 27 28 29 30 31 33 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 51 52 53 54 55 56 56 56 56 56 56 56 56 56 56 56 56		

Age	Male Annuitants and Nonannuitants, including Disabled Participants	Female Annuitants and Nonannuitants, including Disabled Participants
64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 90 91 92 93 94 95 96 97 98 99 102 102 103 104 104 105 105 105 105 105 105 105 105 105 105		

Age	Male Annuitants and Nonannuitants, including Disabled Participants	Female Annuitants and Nonannuitants, including Disabled Participants
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The above rates were developed based on an experience study period from November 1, through October 31, for the Plan and Merging Plan 1, and an experience study period from January 1, through December 31, for Merging Plan 2 and Merging Plan 3. The base year of the experience period is The rates were calculated by adjusting the applicable standard mortality tables in section 1.430(h)(3)-1(d) of the Regulations, using the mortality ratio and credibility weighting factor determined by aggregating male and female experience, as shown in the table below.

,	Male and Female, Annuitants and Nonannuitants, Including Disabled Participants
Mortality ratio	
Credibility Weighting Factor	

The Internal Revenue Service ("IRS") has reviewed the substitute mortality rates and supporting information, and has determined that based on the information submitted, the rates were developed in accordance with section 1.430(h)(3)-2 of the Regulations and Revenue Procedure 2017-55.

The above rates must be applied on a generational basis, as provided in section 1.430(h)(3)-2(c)(3) of the Regulations.